

MINUTES

MEETING NAME	Technical Assurance of Metering Expert Group (TAMEG)
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Meeting number	37
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Date of meeting	03/04/2019
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Venue	ELEXON
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Classification	Public
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ATTENDEES AND APOLOGIES

Attendees	Mike Smith	MS	ELEXON Chairman
	Michael Taylor	MT	ELEXON Technical Secretary
	Chris Day	CD	ELEXON
	Kat Higby	KH	ELEXON
	Ryan Dale	RD	ELEXON (Part Meeting)
	Beth Proctor	BP	ELEXON (Part Meeting)
	Warren Lacey	WL	Northern Powergrid
	Kevin Walker	KW	E.ON
	Antony Hobbs	AH	Industry Expert
	Tom Chevalier	TC	Association of Meter Operators
	Richard Turner	RT	EDF Energy
	Daniel Lewis	DL	EDF Energy
	Calvin MacFarlane	CM	Npower
	Ron Cook	RC	Industry Expert
	Lisa Young	LY	C&C Group (Technical Assurance Agent)
	Colin Gentleman	CG	SSE
	Dan Rynne	DR	IMServ
	Michael Messenger	MM	IMServ

Apologies	There were no apologies.
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PUBLIC

1. Introductions and Apologies

- 1.1 A TAMEG Member questioned whether TAMEG would be recruiting more members. A TAMEG Member added that it would be useful to have more Supplier and Licensed Distributor System Operator (DSO) representatives at TAMEG, as the majority of members were Meter Operator Agents (MOA).
- 1.2 A TAMEG Member noted that the website does not currently have an up-to-date members list. ELEXON took an action to update the ELEXON website with the up-to-date members list.

2. Action

- 2.1 **Action 30.12:** ELEXON agreed to report concerns (to the Performance Assurance Board (PAB))¹ of Business Network Operators (BNO) Energisation not being appropriate for Settlement due to the lack of knowledge.
- 2.2 Update -Issue 72 is looking at Commissioning measurement transformers owned by non-BSC Parties on Licence Exempt Networks (LENs) (including those managed by Building Network Operators (BNOs)) however, energisation on LENs is part of a wider issue and so not in scope for Issue 72. Issue 72 will recommend that Ofgem look into the wider issues caused by the lack of governance of LENs. ELEXON will assist Ofgem in this work. The TAMEG agreed to close Action 30.12. **Action closed.**
- 2.3 **Action 31:01:** KH agreed to investigate outstanding Non-Compliances (NCs) for CTs/VTs in the Licenced Distribution System Operator (LDSO) areas to compare with RCs CT/VT data and the National Measurement Transformer Error Statement (NMTES) to see what's missing.
- 2.4 Update - This action will begin following the completion of ACTION 31.03 (below). **Action to remain open.**
- 2.5 **Action 31:03:** ELEXON to take paper to the Supplier Volume Allocation Group (SVG) to get RC's data on to the National Measurement Transformer Error Statement (NMTES) so the related Current Transformer (CT)/Voltage Transformer (VT) non-compliances can be cleared. ELEXON noted that 80% of data is already available on NMTES. An update will be delivered to the TAMEG following completion of the review. Analysis of the data ongoing. Lack of resource time has delayed progress.
- 2.6 Update - ELEXON noted that Action 31:01 was yet to be completed and therefore **Action 31:03 would remain open**, due to resource constraints.
- 2.7 **Action 32:02:** MS noted all the issues regarding compliance certificates and agreed to set up a working group to discuss the issues in more detail to add new requirements to [BSCP601](#)².
- 2.8 Update – This is currently sitting with the change team. The Chairman thanked Anthony Hobbs for providing a list of Outstations that manufacturers may no longer support. ELEXON noted that it is the Registrant's responsibility to ensure that Meters and Outstations are compliant with the relevant Code of Practice (CoP) pre-November 2008 and evidence this to the Technical Assurance Agent (TAA). Compliance testing under³ BSCP601 was made mandatory by [CP1238](#)⁴. ELEXON added that one option could be to create a generic Metering Dispensation for Meters and Outstation that were not on the CoP compliance and protocol approval list (located on the [CoPs page](#)) (or with sufficient evidence to prove compliance ELEXON could ask the Imbalance Settlement Group (ISG) and/or Supplier Volume Allocation Group (SVG) to add them to the list). **Action to remain open.**
- 2.9 **Action 32.08:** A TAMEG Member advised that the Meter Operator Code of Practice Agreement (MOCOPA) labels should be used in Settlement for determination of class accuracy and CT ratios.
- 2.10 Update - ELEXON noted that it would address Action 32.08 in Agenda Item 10. **Action closed.**
- 2.11 **Action 34.01:** SJ agreed to investigate the request of the Aggregation Rule from the Registrant and Central Data Collection Agent (CDCA) and noted that it may involve raising a change to the TAA Local Working

¹ Added by ELEXON post TAMEG35 for clarification.

² Metering Protocol Approval and Compliance Testing

³ 'Metering Protocol Approval and Compliance Testing'

⁴ 'Requirement to mandate compliance testing for Meters and Outstations'

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Instructions (LWI). The TAA confirmed that a change request is not required, but the TAA LWI will need to be updated.

- 2.12 Update - The TAMEG agreed to keep the action open, pending Technical Assurance Agent (TAA) re-procurement. **Action to remain open.**
- 2.13 **Action 34.02:** ELEXON to provide update in January TAMEG Meeting. SJ agreed to take the points from the discussion on "Re-classifying Category 1 Non-Compliances" away, add the extra steps to the diagram and circulate the updated diagram to TAMEG members. Under Agenda item 7 at TAMEG 32 SJ noted that further amendments will be made to the diagram and it will be circulated to TAMEG via email. KH agreed to circulate amended diagram to members and take output to the PAB for approval. ELEXON to provide update in January TAMEG Meeting.
- 2.14 Update - ELEXON noted that it would consider the re-classification of Category 1 non-compliances diagram in the TAA re-procurement. **Action closed.**
- 2.15 **Action 34.10:** The TAMEG recommended that all non-compliances raised prior to the implementation of P283 should be closed. ELEXON took an action to investigate this and make a recommendation to the PAB. ELEXON noted the TAMEG comments are being taken to [PAB210](#). Further investigation will take place following the PAB meeting. ELEXON noted that discussions with the TAA did not result in a conclusive answer about closing all pre P283 commissioning related non-compliances. ELEXON advised TAMEG to provide further evidence to the PAB to demonstrate that sites are Commissioned correctly.
- 2.16 Update - No evidence provided by TAMEG members. **Action closed.**
- 2.17 **Action 35.01:** MS noted that one LDSO had agreed to provide energisation status data following TAMEG 35. MS noted that ELEXON's compliance team had requested and received a copy of the other responses presented. MS agreed to provide the additional information provided by that LDSO after the TAMEG 35 meeting to the ELEXON compliance team for review. ELEXON commented that the LDSO has been chased and it is still waiting for a response which will be passed to the compliance team.
- 2.18 No update. **Action to remain open.**
- 2.19 **Action 35.02:** ELEXON recommended closing ACTION 32.09 and splitting it into two. Action 35.02 was to
- update to the accuracy requirements for CTs (in CoPs 3 and 5) and Meters (in CoP5).
- 2.20 ELEXON noted that action is to be delayed awaiting progression of 'enabling Change Procedure (CP)'.
- 2.21 Update - ELEXON noted that it would address this action in Agenda Item 10. **Action closed.**
- 2.22 **Action 35.03:** Action 35.03 was about:
- the wider changes to the requirement to provide certificates to the TAA and the process for assessment of overall accuracy of a Metering System.
- 2.23 ELEXON commented that action will be initially progressed as an 'enabling CP' to all other certificate related work-streams and will be discussed at future TAMEG meetings.
- 2.24 Update - ELEXON noted that it would address this action in Agenda Item 10. **Action closed.**
- 2.25 **Action 35.05:** A TAMEG Member noted that Licenced Distribution System Operators (LDSOs) had been charging MOAs to provide access to assets owned by the MOA housed in LDSO Substations. This is non-compliant with the MOCOPA. TAMEG Members to raise this issue with MOCOPA. A TAMEG Member noted that in some instances, following access, LDSOs had been charging to provide access to switch gear. The TAMEG agreed to keep this action open and for the Association of Meter Operators (AMO) representative to send a letter to MOCOPA to inform them of the situation. **Action to remain open.**
- 2.26 **Action 35.06:** ELEXON noted that 16 CoP10 Metering Systems had been selected during the 2018/19 audit year as they were registered as Measurement Class C. The TAMEG advised Registrants to complete a data

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cleanse of their portfolios for target MPANs which may have experienced the issue. The TAA is to continue the audit ensuring all cases are highlighted, monitored, and will report back. At TAMEG 36, under Agenda Item 5, ELEXON commented that the data cleansing exercise is ongoing.

- 2.27 Update - ELEXON noted that it is still ongoing, there is inconsistency between whether they are Measurement Class C or COP10. ELEXON noted that Suppliers will be contacted. A TAMEG member suggested the TAA should just audit them (or get Suppliers to carry out the audit). The TAMEG agreed to contact Suppliers.

Action to remain open.

- 2.28 **Action 36.01:** A TAMEG Member questioned whether there should be time obligations on TAA with regards to rectification reviews. The TAA responded that the status does not change if evidence has been requested and it is therefore difficult to determine which party is currently responsible for the next steps. A TAMEG Member commented that parties are unable to resolve non-compliances whilst waiting for the TAA to approve rectification plans. ELEXON to investigate SLAs with regards to TAA timescales for reviewing rectification plans and additional statuses for better transparency for the process 'next steps'.

- 2.29 Update - ELEXON to investigate SLA's during re-procurement and provide an update following re-procurement. **Action to remain open.**

- 2.30 **Action 36.02:** A TAMEG Member queried whether the TAA uses a specific power factor (PF) to obtain the individual error contributions of measurement transformers when the calibration certificates do not provide errors at that PF and what value of burden is applied in the overall accuracy calculation. A TAMEG Member queried whether the TAA is able to provide examples of PFs used in the overall accuracy calculation when the information is not provided on the measurement transformer calibration certificates. The TAA agreed to send examples.

- 2.31 **Update** - ELEXON informed the TAMEG that the power factor calculations and measurement uncertainty are not used as part of the overall accuracy calculation conducted by the TAA. A TAMEG Member commented that they needed to be certain about the method used by the TAA to prove overall accuracy. ELEXON responded that in some cases an MOA may be compliant to the overall accuracy limits of the CoPs by installing Metering Equipment of the correct class accuracy. **Action to remain open.**

- 2.32 **Action 36.03:** A TAMEG Member noted that measurement uncertainty is often not included on the Meter certificates and added that measurement uncertainties should be on the CT/VTs certificates. A TAMEG Member enquired whether the TAA uses an average. The TAA responded that the measurement uncertainties from the Meter certificates are used when possible but the TAA will raise a query with site auditors as to their process in the December 2018 TAA auditor team briefing.

- 2.33 Update - The TAMEG agreed to close the action. **Action closed.**

- 2.34 A TAMEG Member noted that they struggled to find the TAA LWI on the website. ELEXON agreed to contact the communications team to resolve website issue.

ACTION 37.02

- 2.35 **Action 36.04:** ELEXON noted that more evidence is required before a proposal regarding calibration certificates can be presented to the PAB. ELEXON recommends that an email is sent out asking for TAMEG Members opinions and suggestions with responses to be discussed at the January TAMEG.

- 2.36 Update - ELEXON noted that it would address this action in Agenda Item 10. **Action closed.**

- 2.37 **Action 36.05:** ELEXON commented that there is some reference in the guidance documents that are to be published in November 2018 as to the standard 'pole orientation' for measurement transformers, but it is not currently in any CoP. A TAMEG Member commented that the CoP should be updated to include orientation of measurement transformers. ELEXON commented that before further action is pursued, National Grid should be consulted.

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- 2.38 Update - ELEXON noted that there had not been any response from National Grid. The TAMEG agreed to keep the action open, awaiting a definitive response. A TAMEG Member questioned whether there should be some guidance around the orientation of CTs installed for Settlement metering. ELEXON noted that there is a wiring diagram included in CoP3 and questioned whether this should include some accompanying text to provide guidance. ELEXON agreed to look into wiring identification/pole orientation obligations that are outlined in other code bodies and make sure that they are aligned and to potentially provide guidance.
- 2.39 **Post meeting note:** On 16 April 2019 ELEXON circulated National Grid Electricity Transmission's (NGET's) email response to the question of defining standard pole orientation in the CoPs to TAMEG members.
- 2.40 ELEXON also produced a (Draft CoP1) Appendix C 'Fusing' diagram showing pole orientation and some draft text for Section 5.1.1 of CoP1 and requested feedback from members before proceeding to do similar diagrams for the other CoPs. **Action to remain open.**

3. Non-compliance stats report

- 3.1 A TAMEG Member noted that the outstanding Category 1 non-compliance stats report was relatively high level and added whether it would be of more use to the TAMEG if it had more granular data.
- 3.2 A TAMEG Member added that visibility over the Category 1 non-compliances was currently poor, particularly for non-compliance types 1.02 and 1.06. ELEXON suggested that the TAA auditors fill in a notes section on Category 1 non-compliance records and added that ELEXON could provide these to the TAMEG prior to quarterly meetings. ELEXON agreed to provide Category 1 non-compliance notes prior to TAMEG meetings.

ACTION 37.03

- 3.3 A TAMEG Member noted that some of the Category 1 non-compliances had been outstanding for over two years. ELEXON noted that, in some instances, Parties were failing to address Category 1 non-compliances following a submission of a rectification plan. A TAMEG Member advised this could be because of a lack of formal milestones.
- 3.4 A TAMEG Member commented that previous discussions had recommended that ELEXON escalate non-compliances to the PAB if they had not been resolved after a certain period of time. ELEXON responded that the previous recommendations had also included a TAA re-visit, which had occurred for some of the outstanding Category 1 non-compliances.
- 3.5 A TAMEG Member recommended that ELEXON should trigger an escalation process if the non-compliance had been outstanding for over a year. ELEXON asked the TAMEG what the preferred escalation process should be. A TAMEG Member suggested that escalation should include additional site visits, PAB notification and potentially the Error and Failure Resolution (EFR) process. ELEXON agreed to escalate the current long outstanding Category 1 non-compliances, through either another TAA site visit, PAB notification or the application of EFR.

ACTION 37.04

- 3.6 A TAMEG Member recommended that rectification plans should contain more structure/milestones for which Parties need to commit, when resolving Category 1 non-compliances. A TAMEG Member added that it would be helpful to see a higher level of granularity when observing the Category 1 non-compliances. ELEXON agreed to investigate the use of milestones in Category 1 non-compliances rectification plans.

ACTION 37.05

4. Trading Disputes Report

- 4.1 A TAMEG Member expressed frustration that as a Half Hourly Meter Operator Agent (HHMOA) they had been taking on Metering Systems with inherited TAA non-compliances. The member commented that the Party Agent responsible for the Metering Systems prior to de-appointment appeared to have little regard for the

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non-compliances while appointed. The TAMEG Member added that it seemed unfair that nobody has held the previous MOA accountable for their non-compliant Metering Equipment. ELEXON responded that the TAA assigns non-compliances to the Metering Equipment and not the Party Agent. Assigning non-compliances to Metering Equipment ensures that non-compliances are not lost following a change of Party Agent.

- 4.2 A TAMEG Member noted that a number of Trading Disputes related to incorrect aggregation rules and noted that these were typically for Central Volume Allocation (CVA) sites⁵. A TAMEG Member responded that aggregation rule issues might be due to Supplier Volume Allocation (SVA) Complex Sites⁶ that contain both Import and Export Meters. ELEXON agreed to undertake a root cause analysis into why there had been an increase in aggregation rule Category 1 non-compliances.

ACTION 37.06

- 4.3 A TAMEG Member queried whether ELEXON notified the Registrant of a Metering System during the Trading Disputes process. ELEXON responded that it notified all relevant Parties (including the Registrant) of any open Trading Disputes. A TAMEG Member queried whether there should be an escalation process for Parties using the Trading Disputes process as a business practice, rather than a last resort. ELEXON noted that TAMEG had previously mentioned this and that they were keen to ensure that Trading Disputes were only a last resort. ELEXON added that work was currently ongoing as part of the Performance Assurance Framework (PAF) review, to better align Performance Assurance Techniques (PATs).

5. New Risk Framework – Verbal

- 5.1 ELEXON noted that they would be building risk profiles against Parties, to help build a risk profile that would make assurance more dynamic/pro-active. ELEXON will base the risk profile on the questions PAB regularly ask parties when making Risk Management Determinations (RMDs). ELEXON noted that the Trading Disputes PAT is a reactive technique that it should only use as a last resort. ELEXON added that the Trading Disputes Committee (TDC) only determine whether a Trading Dispute is valid or not, but agreed that there could be more emphasis on root causes and drivers.

6. PAB Agreement to TAA Activity in 2019/20 – Verbal

- 6.1 A TAMEG Member enquired whether the scope would include Offshore wind farms. ELEXON noted that it presented an evaluation of the Offshore wind farm TAA audits to the PAB in February. The PAB agreed that three Offshore wind farms will be audited in the 2019/20 audit year.
- 6.2 A TAMEG Member noted that the planning of Offshore wind farm TAA audits are costly and added that it is essential to plan them effectively. A TAMEG Member added that there should be regular cost benefit analysis, to ensure there is still value in conducting the Offshore audits. A TAMEG Member queried whether there was additional steps that the TAA could take to improve the planning stages of Offshore audits to help reduce the cost.

7. The TAA Re-procurement – Verbal

- 7.1 ELEXON advised that the Panel have approved a Tender Framework Statement to procure the services of a Technical Assurance Agent and the procurement will comply with Section E of the BSC.

8. Removing the requirement to present calibration certificates to the TAA (Agenda item 10)

⁵ Aggregation Rule issues for CVA sites are denoted as Dispute Type 'General'.

⁶ Aggregation rule issues for SVA Complex Sites are denoted as Dispute Type 'HH SVA'.

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- 8.1 A TAMEG Member noted that there is a difference between what is mandatory through the CoPs, with respect to compensation, and what the industry considers good practice. A TAMEG Member added that it may be more appropriate for CVA sites to be compensated for measurement transformer errors, but added that some MOAs apply compensation as best practice across the board.
- 8.2 A TAMEG Member commented, in respect to CoP3 and CoP5 Meters, if the Metering Equipment is compliant to the relevant IEC standard then it should be recording correctly. A TAMEG Member added that the quality of modern Metering Equipment is such that the margin of error should be negligible. A TAMEG Member questioned whether they could use generic error statements in place of calibration certificates. ELEXON responded that parties could use the National Measurement Transformer Error Statement (NMTES) where Calibration Certificates are not available. A TAMEG Member responded that issues arise with using NMTES where sites have differing burdens as NMTES only has one value (at an unspecified burden).
- 8.3 A TAMEG Member questioned whether the installing Party should be responsible for maintaining calibration certificates in order to eliminate the need for Parties to transfer them. A TAMEG Member added that there are serious issues with the current processes that require LDSOs to be send them via email.
- 8.4 A TAMEG Member noted that calibration certificates only record the accuracy of the measurement transformers at the time of manufacturer testing. Therefore, for measurement transformers installed over 5-10 years ago the calibration certificates may no longer be valid.
- 8.5 A TAMEG Member queried whether there had been any recent Trading Disputes as a result of poor accuracy. ELEXON responded that most sites that had Trading Disputes related to Metering Equipment also had poor record keeping. A TAMEG Member noted that obligations should not change for CoP1 or CoP2 sites, but potentially for CoP3 and CoP5 sites.
- 8.6 The TAMEG agreed that any CP should not change CoPs 1 and 2. A TAMEG Member suggested that a CP could change the thresholds for the capacity of CoP registration. ELEXON advised that all changes would require a consultation as part of the Change Process. ELEXON agreed to draft a Change Proposal for TAMEG Members to review. ELEXON noted that the CP would be progressed quicker should a BSC Party raise it.

ACTION 37.08

9. Non-compliances – Ones the Registrant is most appropriate to deal with (e.g Aggregation Rules)

- 9.1 A TAMEG Member questioned whether the TAA notified the Registrant of non-compliances, as well as the MOA. ELEXON responded that non-compliances are raised against the Metering Equipment and is then the responsibility of whomever is best placed to resolve it; typically, the MOA on behalf of the Registrant, under the Supplier hub principle.
- 9.2 ELEXON advised undertaking some analysis to help determine whether certain Parties were failing to rectify non-compliances. ELEXON also to consult with the PAB Chair to see if it could highlight poorly performing Parties to the PAB.

ACTION 37.09

10. The benefit of getting the HHDC/CDCA to confirm the relationship between main and check for CoPs 1, 2 & 3 Metering Systems – verbal

- 10.1 ELEXON noted that it had performed some analysis around the HHDC/CDCA relationship check for CoPs 1, 2 and 3 sites. A TAMEG Member questioned whether there was value in the checks. ELEXON agreed to investigate previous analysis and feedback to TAMEG.

ACTION 37.10

11. AOB

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- 11.1 A TAMEG Member expressed concern with the number of outstanding Category 1 non-compliances and noted that Parties can sometimes hide issues through reorganisation of rectification plans into groups.
- 11.2 A TAMEG Member noted that ELEXON had not updated the P283 contact list for a while. ELEXON to update the P283 contact list, including initial contact and escalation contact.

ACTION 37.11

12. Next Meeting

- 12.1 The next meeting will take place on Thursday 18 July 2019.